

January 14, 2003

Mr. Sherman Drew  
NCP Coatings Inc. (Mishawaka Facility)  
1413 Clover Road  
Mishawaka, IN 46545

Re: 141-16903  
Notice-only change to  
MSOP 141-15583-00196

Dear Mr. Sherman:

NCP Coatings Inc. (Mishawaka Facility) was issued MSOP No. 141-15583-00196 on April 9, 2002, for a paint manufacturing operation. A letter requesting the Office of Air Quality (OAQ) for permit changes was received on December 13, 2002. The changes requested are related to the deletion of performance testing requirements for Paint Line # 1. In addition, upon review of the permit, OAQ has determined that compliance monitoring requirements for particulate matter for Paint Line # 1 is not necessary, as the allowable PM emissions for Paint Line # 1 is less than 10 pounds per hour and condition D.1.1 limits VOC emissions to 24 tons per year. Since these permit conditions were included in error, pursuant to the provisions of 326 IAC 2-6.1-6, a notice-only change is hereby granted as follows (~~strikeout~~ to show deletions and **bold** to show additions):

(1) Condition D.1.6 is deleted as follows:

~~D.1.6—Testing Requirements~~

~~To determine compliance with the limits of Conditions D.1.2, the owner or operator shall, during the period between 30 and 36 months after issuance of this permit, perform PM testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Said testing shall be conducted in accordance with Section C- Performance Testing.~~

(3) Condition D.1.7 is renumbered as D.1.6.

(2) Condition D.1.8 is deleted:

~~D.1.8—Compliance Monitoring, Particulate Matter (PM) Limitations~~

~~To demonstrate compliance with the limits of Condition D.1.2, the owner or operator shall:~~

- ~~(a) perform daily visible emission notations of the stack exhaust of baghouse D-1 during normal daylight operations when Mixing Line 1 is in operation and the baghouse is exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~

~~For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not~~

~~counting startup or shut down time.~~

~~In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~

~~A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process;~~

- ~~(b) observe and record at least once a week, the total static pressure drop across baghouse D-1 when either Mixing Line 1 is in operation and venting to the atmosphere.~~

~~The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAG, and St. Joseph County Local Agency and shall be calibrated at least once every six (6) months.~~

~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouse D-1 shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test; and~~

- ~~(c) perform at least once each calendar quarter, an inspection of all bags of baghouse D-1 while the baghouse is venting to the atmosphere. Said inspections are optional when venting indoors. Should the owner or operator detect any defective bags, the owner or operator shall replace them.~~

(3) Condition D.1.9 is deleted:

~~D.1.9 Broken or Failed Bag Detection~~

~~In the event that bag failure has been observed:~~

- ~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B - Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~
- ~~(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency~~

(4) Condition D.1.10 is modified and Condition D.1.11 is re-numbered:

D.1.10 7      Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the owner or operator shall maintain for Mixing Line 1, the following records:

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Mishawaka, Indiana

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- (1) the amount of each VOC containing material in ton, as recorded pursuant to the requirements of Condition ~~D.1.7~~ **D.1.6**,
  - (2) the total amount VOC containing material in tons, as recorded pursuant to the requirements of Condition ~~D.1.7~~ **D.1.6**,
  - (3) the estimated VOC emissions from each mixing line in tons, as recorded pursuant to the requirements of Condition ~~D.1.7~~ **D.1.6**,
  - (4) Material Safety Data Sheets (MSDS) for all materials used, and
  - (5) purchase orders and invoices of all VOC containing materials used.
- (b) ~~To document compliance with Conditions D.1.2, the owner or operator shall maintain a log of the daily visible emission notations, weekly pressure drop readings, and quarterly inspections, as required in Condition D.1.8.~~

**D.1.44 8 Reporting Requirements**

(5) The Table of Contents is modified as follows:

D.1.5 Compliance Determination, VOC Limitations  
~~D.1.6 Testing Requirements~~

**Compliance Monitoring Requirements**

~~D.1.7 6~~ Compliance Monitoring, Volatile Organic Compound (VOC) Limitations  
~~D.1.8 Compliance Monitoring, Particulate Matter (PM) Limitations~~

~~D.1.9 Broken or Failed Bag Detection~~

**Record Keeping and Reporting Requirements**

~~D.1.407~~ Record Keeping Requirements  
**D.1.448** Reporting Requirements

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

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cc: File - St. Joseph County  
U.S. EPA, Region V  
St. Joseph County Health Department  
St. Joseph County Local Agency

Northern Regional Office  
Air Compliance Section Inspector - Rick Reynolds  
Compliance Data Section - Karen Nowak  
Administrative and Development  
Technical Support and Modeling - Michele Boner

**MINOR SOURCE OPERATING PERMIT  
OFFICE OF AIR QUALITY**

**and**

**St. Joseph County Local Agency**

**NCP Coatings, Inc.  
1413 Clover Road  
Mishawaka, Indiana 46545**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 141-15583-00196	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 9, 2002

1 <sup>st</sup> Notice Only Change No. 141-16903	Pages Modified: 2, 3, 19, 20, 21
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:January 14, 2003

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### A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]
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- B.2 Definitions
- B.3 Effective Date of the Permit [IC 13-15-5-3]
- B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]
- B.5 Modification to Permit [326 IAC 2]
- B.6 Minor Source Operating Permit [326 IAC 2-6.1]
- B.7 Local Agency Requirement

### C SOURCE OPERATION CONDITIONS

- C.1 Preventive Maintenance Plan [326 IAC 1-6-3]
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- C.3 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]
- C.4 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]
- C.5 Permit Revocation [326 IAC 2-1-9]
- C.6 Opacity [326 IAC 5-1]
- C.7 Fugitive Dust Emissions [326 IAC 6-4]
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- C.10 Monitoring Methods [326 IAC 3]
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#### Record Keeping and Reporting Requirements

- C.13 Malfunctions Report [326 IAC 1-6-2]
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- C.15 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-3]
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### D.1 EMISSIONS UNIT OPERATION CONDITIONS - Paint Mixing Operation

#### Emission Limitations and Standards

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]
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- D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

#### Compliance Determination Requirements

- D.1.5 Compliance Determination, VOC Limitations

## **Compliance Monitoring Requirements**

### **D.1.6 Compliance Monitoring, Volatile Organic Compound (VOC) Limitations**

NCP Coatings, Inc.  
Mishakawa, Indiana  
Permit Reviewer: SDF

1<sup>st</sup> Notice-Only Change No. 141-16903  
Modified By: Madhurima D. Moulik

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## **Record Keeping and Reporting Requirements**

### **D.1.7 Record Keeping Requirements**

### **D.1.8 Reporting Requirements**

## **D.2 EMISSIONS UNIT OPERATION CONDITIONS - Miscellaneous Emission Units**

### **Emission Limitations and Standards**

#### **D.2.1 Particulate Matter (PM) [326 IAC 6-2]**

**Annual Notification**

**Malfunction Report**

**Quarterly Report**

For the purposes of this Condition, VOC containing material is defined as any materials used at Mixing Line 1 that contains any amount of any carbon compounds other than:

- (a) carbon monoxide,
- (b) carbon dioxide,
- (c) carbonic acid,
- (d) metallic carbides or carbonates,
- (e) ammonium carbonate, and
- (f) any of the following non-photochemically reactive hydrocarbons:

- |      |  |                         |
|------|--|-------------------------|
| (1)  | Methane  | (CAS Number 74-82-8),   |
| (2)  | Ethane   | (CAS Number 74-84-0),   |
| (3)  | 1, 1, 1, trichloroethane   | (CAS Number 71-55-6),   |
| (4)  | 1, 1, 1, trichloro-2, 2, 2- trifluoroethane  | (CAS Number 76-13-1),   |
| (5)  | Trichlorofluoromethane   | (CAS Number 75-69-4),   |
| (6)  | Dichlorodifluoromethane  | (CAS Number 75-71-8),   |
| (7)  | Chlorodifluoromethane  | (CAS Number 75-46-7),   |
| (8)  | Trifluoromethane   | (CAS Number 75-46-7),   |
| (9)  | 1,2, dichloro 1, 1, 2, 2 tetrafluoroethane   | (CAS Number 132-03-72), |
| (10) | Chloropentafluoroethane  | (CAS Number 76-15-3),   |
| (11) | 1, 1, 1 trifluoro 2,2 dichloroethane   | (CAS Number 306-83-2),  |
| (12) | 1, 1, 1, 2 tetrafluoroethane   | (CAS Number 811-97-2),  |
| (13) | 1, 1 dichloro 1 fluoroethane   | (CAS Number 1717-00-6), |
| (14) | 1 chloro 1, 1 difluoroethane   | (CAS Number 75-68-3),   |
| (15) | Methylene chloride   | (CAS Number 75-09-2),   |
| (16) | 2 chloro 1, 1, 1, 2 tetrafluoroethane  | (CAS Number 2837-89-0), |
| (17) | Pentafluoroethane  | (CAS Number 354-33-6),  |
| (18) | 1, 1, 2, 2 tetrafluoroethane   | (CAS Number 359-35-3),  |
| (19) | 1, 1, 1 trifluoroethane  | (CAS Number 420-46-2),  |
| (20) | 1, 1 difluoroethane  | (CAS Number 75-37-6),   |
| (21) | Any perfluorocarbon compounds which fall into the following classes:                           |                         |
| (A)  | Cyclic, branched, or linear, completely fluorinated alkanes,                                   |                         |
| (B)  | Cyclic, branched, or linear, completely fluorinated ethers with no unsaturations,              |                         |
| (C)  | Cyclic, branched, or linear, completely fluorinated tertiary amines with no unsaturations, and |                         |
| (D)  | Sulfur containing perfluorocarbons with no unsaturations and with sulfur                       |                         |



bonds only to carbon and fluorine,

- (22) Parachlorobenzotrifluoride (CAS Number 98-56-6),
- (23) Cyclic, branched, or linear completely methylated siloxanes, and
- (24) Acetone (CAS Number 67-64-1).

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### **Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

#### **D.1.6 Compliance Monitoring, VOC Limitations**

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To demonstrate compliance with the limits of Condition D.1.1, the owner or operator shall record, on a monthly basis, the following for Mixing Line 1:

- (a) the amount of each VOC containing material in tons,
- (b) the total amount VOC containing material in tons, and
- (c) the estimated VOC emissions from the mixing line in tons, as required in Condition D.1.5.

### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

#### **D.1.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1, the owner or operator shall maintain for Mixing Line 1, the following records:
  - (1) the amount of each VOC containing material in ton, as recorded pursuant to the requirements of Condition D.1.6,
  - (2) the total amount VOC containing material in tons, as recorded pursuant to the requirements of Condition D.1.6,
  - (3) the estimated VOC emissions from each mixing line in tons, as recorded pursuant to the requirements of Condition D.1.6,
  - (4) Material Safety Data Sheets (MSDS) for all materials used, and
  - (5) purchase orders and invoices of all VOC containing materials used.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.8 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the

certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

NCP Coatings, Inc.  
Mishakawa, Indiana  
Permit Reviewer: SDF

1<sup>st</sup> Notice-Only Change No. 141-16903  
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